



NOTIFICATION OF

EPA Region 5 Records Ctr.

# BOARD OF DIRECTORS ACTION

ADDRESSEE

Mr. Bartels -

COPIES TO

Mr. Duckworth Mr. T. Gallagher

This is to notify you that the the following action:

x Executive Committee

at its meeting # 979 on July 28, 1976 too

Board of Directors

Approved the following resolution:

RESOLVED, that Mr. W. A. Wilkinson, the plant manager of the East St. Louis, Illinois plant of this corporation, be and he is hereby authorized to sign and deliver all permit applications made on behalf of this corporation in conformity with the laws and regulations of the environmental control agencies of the State of Illinois.



NOV 19 1982 E.P.A. — DILL C. STATE OF LLINOIS CL HCP WENL HW7

You are requested to advise any people in your area who are affected by this action, if they are not listed above.

OFFICE OF THE SECRETARY - Executive Committee

DATE

August 26, 1976

## VI. Facility Information

- A. Plan Sheet of the Site EXHIBIT C
- 3. Process Flow Diagrams
  - 1. Sulfuric Acid Pickle Liquor EXHIBIT D.
  - 2. Hydrochloric Acid Pickle Liquor EXHIBIT E.
- C. Methods of Operation

1. Type of operation

NOV 19 1982

a. Batch

E.F.A. — D.L.P.C.

- 2. Days and hours of operation
  - a. 24 hours/day 7 days/week
- 3. Total plant employment 350.
  Directly responsible for operation of hazardous waste facilities 8.
- 4. Traffic patterns
  - a. Loads per year of:
    - (1) Hydrochloric Acid Pickle Liquor 950.
    - (2) Sulfuric Acid Pickle Liquor 120.
  - the pickle liquor is delivered in tank trucks constructed of corrosion proof material. The loaded tank trucks are within the load limits as established by the Illinois Department of Transportation and are within the load bearing capacities of the roads used for transport purposes. The transporters of the wastes have been permitted to haul hazardous wastes and are listed as follows:

Transporter

U.S. EPA I.D. Number

Ruan Inc. Garcia IAT200010049 ILD045729787

- 5. Equipment utilized
  - a. Sulfuric Acid Pickle Liquor
    - (1) One storage tank approx. 35,000 gals.

    - (3) One claraflocculator tank.
  - b. Hydrochloric Acid Pickle Liquor
    - (1) Two storage tanks approx. 48,000 gals.
    - (2) Three neutralizer tanks approx. 25,000 gals/batch.
    - (3) Two settling tanks.
- 6. The primary ingredients in the spent pickle liquors are water, sulfuric acid (8-10%), hydrochloric acid (1-2%), ferrous sulfate and ferrous chloride. When mixed in any proportion, these wastes are not ignitable, reactive or incompatible.
- 7. Since all wastes are processed in liquid form, no dust controls are required. Odors are within the limits of the Illinois EPA air criteria and require no controls.
- 8. Because the hazardous wastes are well contained within the previously described tanks, daily cleanup is not necessary.
- Dupon arrival, a sample is taken from each truckload of pickle liquor. The sample is checked for pH and the color of the sample is observed; if these parameters are within acceptable limits, the truck is unloaded into storage. The sample is retained.

Once a week the hydrochloric acid and the sulfuric acid pickle liquor retained samples are separately composited and analyzed primarily for free acid and iron content. The primary purpose of this sampling and analytical program is to assure an acceptable quality of raw materials for the manufacturing of iron oxide products.

There has also been some third party analytical work done to determine typical heavy metals content of pickle liquor. A typical example is shown on EXHIBIT F.

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E. From the neutralization and clarification processes, a small quantity of sludge is generated as a waste. This sludge does not exhibit hazardous waste characteristics in that the ph is no longer at corrosive levels and any heavy metals present have been precipitated to a water insoluble form. This sludge is subsequently sent to the on site Waste Water Treatment Plant (WWTP) where it is commingled with substantially greater quantities of wastes from the iron oxide manufacturing process. These wastes are treated with lime and the resulting solids are settled in thickeners, filtered on a rotary drum filter, into trucks. These wastes have a non-hazardous waste classification as determined under EPA procedures as listed under 40 CFR Subpart B, section 261.24.

The wastes are hauled to Illinois EPA approved landfill sites as follows:

Site Name	Location	Site Number
Jerseyville Sanitation Corp. Belleville Mid-State Belleville Bi-State	Jerseyville, IL Belleville, IL Belleville, IL	08380401 16381401 16381601

EXHIBIT G documents State approval for a site to dispose of Pfizer non-hazardous waste.

EXHIBIT I is a copy of a manifest for a load of non-hazardous waste to an approved site.

The effluent from the WWTP is discharged into the local sewerage system and then to the local POTW (EXHIBIT L).

F. Although the site has a modest amount of firefighting equipment (i.e. hydrants, extinguishers and hose houses), the incident of fire connected to hazardous waste activities is considered rather remote. As required under RCRA, the local fire department has visited the plant and inspected the hazardous waste facilities. The plant has a Contingency Plan as shown on EXHIBIT H.

There is no secondary containment for the various tanks connected with the on site hazardous waste activities.

G. The hazardous waste facilities are, for all practical purposes, manned with operating and supervisory personnel 7 days/week, 24 hours/day basis. As a part of their duties, each operator is required to conduct periodic inspections and note any malfunctions with regards to hazardous waste facilities. A typical inspection report is shown on EXHIBITS J and K.

A. Should the hazardous waste facilities be subject to closure, it is assumed that the pickle liquor in the system would be consumed in manufacturing operations leaving relatively small amounts of liquor and sediment in the various tanks. It is estimated that with 1 to 2 hours of hosing per tank, each tank would be cleaned to the point where any remaining pickle liquor residue would be negligible. All rinse water could be treated in the on site Waste Water Treatment Plant.

A post-closure plan would be non-applicable to this operation. Also, there is no expected closure for the foreseeable future.

I. The land upon which the Pfizer facility is located has been zoned M2 "Heavy Manufacturing" by a City of East St. Louis zoning ordinance.

Except for the subject permit application, the plant has permits and/or contracts for all air, water and solid waste activities. All sources are in compliance with criteria and have passed repeated inspections by various Illinois EPA personnel.

Although there are some residential areas within short distance of the site, the area is extremely blighted with perhaps upward of 30% of the residences uninhabital due to fire, vandalism, etc.

The site does not dispose of solid waste thus megatating the importance of geological and hydrological factors.

There is a U.S. Highway (Rt. 64) within about  $\frac{1}{2}$  road miles from the plant site. The local roads are designed to handle commercial traffic.

# VII. Storage and/or Transfer

- A. Physical location see EXHIBIT C
- B. Materials of construction
  - Storage tank for sulfuric acid pickle liquor is a steel shell with a corrosion proof liner and 9" of acid brick.
  - 2. Storage tanks for the hydrochloric acid pickle liquor are steel shells with a corrosion proof rubber liner.
  - 3. All neutralizers are steel shells with a corrosion proof liner and approx. 9" of acid brick.

- C. Including storage and neutralizer (i.e. treater) tanks, there are nine tanks involved in hazardous waste activities.
- D. Based upon current availability of pickle liquor and plant production activity, duration of storage is:
  - l. For Sulfuric Acid Pickle Liquor two weeks.
  - 2. For Hydrochloric Acid Pickle Liquor one week.
- E. Age of container 2 years to 34 years
   indefinite life
- F. Spent pickle liquor from steel finishing operations K062.
- G. Design Tank
  - I. Hydrochloric Acid (HCL) Pickle Liquor storage tanks O.D. = 21' 3/8"; I.D. = 20' 1/2"; H = 20' 8 13/16".
  - 2. Sulfuric Acid  $(H_2SO_4)$  Pickle Liquor storage tank O.D. = 20' 0"; I.D. = 18' 4"; H = 14' 11".
  - 3. Neutralizer (treater) tanks I.D. = 19' 11"; H = 22' 0".

## H. Capacity

- 1. HCL Pickle Liquor storage tanks 48,000 gals.
- 2. H<sub>2</sub>SO<sub>4</sub> Pickle Liquor storage tank 35,000 gals.
- 3. Neutralizers 25,000 gals.

### I. Structure

- l. Tank shell thickness varies from 3/16" to 1/2". Floor thickness 1/4" to 1/2".
- 2. All tanks are lined with a corrosion resistant membrane.
- 3. The H<sub>2</sub>SO<sub>4</sub> pickle liquor storage tanks and all the neutralizers are also lined with about 9" of acid brick.
- J. Connection No piping diagrams are available. Tanks are connected with corrosion proof piping, flanged fitting. All valves are manually operated.
- K. Code No code requirements apply to subject tanks. Design and construction done in accordance with accepted engineering practices.

### VIII. Treatment

- A. T31 Neutralization
- B. The pickle liquor is transferred batchwise from the storage tanks to the neutralizer (i.e. treatment) tanks which contain scrap iron. Heat in the form of live steam is applied and after 18 to 24 hours, the free acid in the pickle liquor is converted to iron salts. The chemical reactions involved are:

$$H_2SO_4 + Fe \stackrel{\triangle}{\rightarrow} FeSO_4 + H_2 \uparrow$$

$$^{\Delta}$$
 2HC1 + Fe  $^{\rightarrow}$  FeC1<sub>2</sub> + H<sub>2</sub>  $^{\uparrow}$ 

The neutralized pickle liquor, which no longer exhibits hazardous waste characteristics, is transferred to other tanks for clarification via sedimentation. The clarified liquor is used as a raw material in the manufacture of iron exide products. The sludge from sedimentation is treated in the on site Waste Water Treatment Plant as was previously described in this document.

C. Type of Waste

Waste type - spent pickle liquor from steel finishing operation

U.S. EPA Hazardous Waste Number - K062

Handling Code - Storage - S02 - Treatment - T31

Quantity - 4,500,000 gals/year

HCl Pickle Liquor	(Typical)
Ferrous Chloride	18.6%
Hydrochloric Acid	1.6%
Water	78.8%
Other	1.0%
	Hydrochloric Acid Water

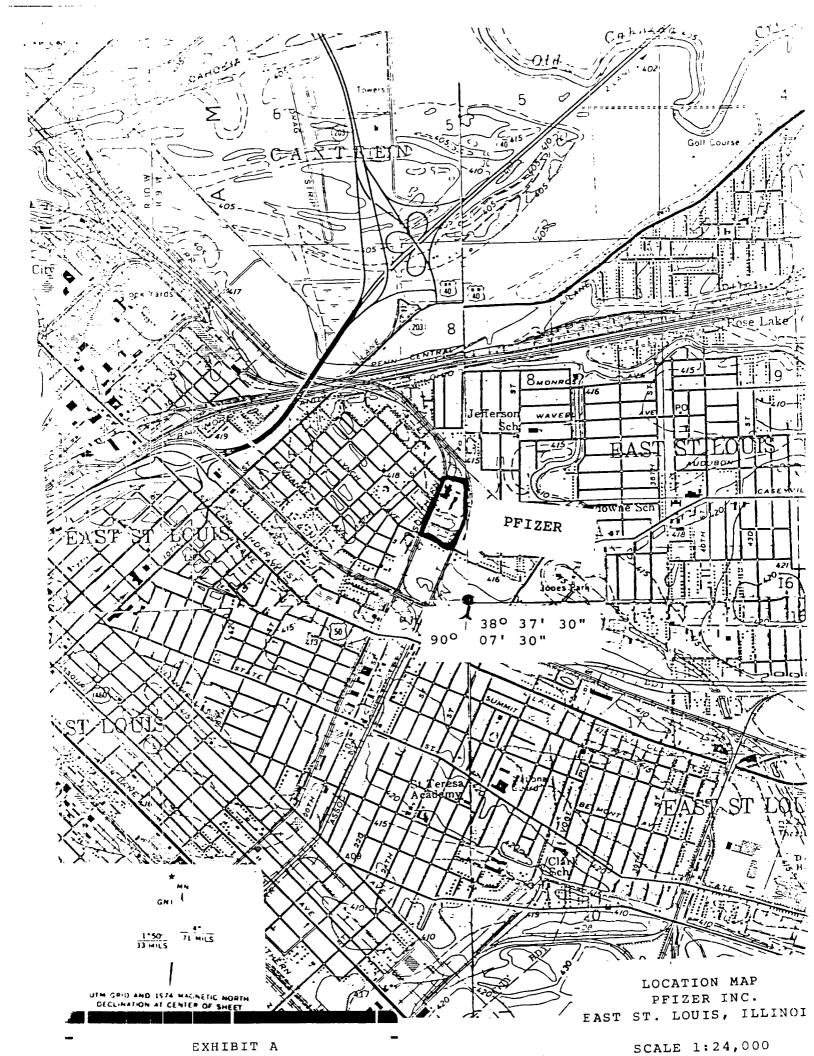
H2SO4 Pickle Liquor	(Typical)
Ferrous Sulfate	15.0%
Sulfuric Acid	14.0%
Water	70.0%
Other	1.0%

Frequency of transfer from other waste management site to Ffizer - Daily.

D. Freatment Objective

To neutralize the free acid in the pickle liquor and to clarify the resultant solution of iron salts so as to provide a high quality raw material for the manufacture of iron oxide products.

E. Batch operation of 20,000 to 25,000 gallons per day per treatment tank (approx. 3,000 gph), which represent about maximum capacity of system.



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WARRAN TT DEED

GEO. S. MEPHAM CORPORATION

C. K. WILLIAMS & CO.

AATE OF HILDORY, SS.

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### WARRANTY DEED

THIS INDENTURE WITNESSETH, that the Grantor, Geo. S. Mepham Corporatior, a corporation of the State of Delaware, for and in consideration of the sum of One Dellar (\$1.00) and other good and valuable considerations to it in hand paid, conveys and warrants to C. K. WILLIAMS & CO., a corporation of the State of Delaware, the following described Real Estate, to-wit: a parcel of ground fronting Six hundred and fifty five (655) feet on the Caseyville Road, by a depth of Five hundred and eighteen (518) feet six (6) inches. Bounied Northwardly by a line distant five hundred and eighteen (508) feet six (6) inches from and parallel with the Caseyville Road, Eastwardly by the Illinois Transfer Railroad Company Right of Way, Southwardly by the Caseyville Road, and Westwardly by the Venice & Carondelet Railroad Right of Way, containing Seven and eighty one hundredth (7 80/100) scres, more or less, being parts of Lots "D" and "A" on the plat of Lansdowne Subdivision, according to a plat of said Subdivision recorded in the Recorder's Office of St. Clair County, Illinois, in Book "I" of Plats, on Page 1.

A strip of ground thirty (30) feet wide extending from the Caseyville Road Northwardly along the Eastern line of the Venice & Carondelet Railroad and a strip of ground thirty (30) feet wide extending from the Caseyville Road Northwardly along the Illinois Transfer Failroad Company are reserved for use as Roads and are to be kept open and unobstructed for the use and benefit of the parties hereto and their grantees and assigns.

Situated in the Subdivisions of Lansdowne, County of St. Clair in the State of Illinois.

A strip of land Sixty Five (65) feet wide off of the Southeasterly side of the following described Real Estate to-wit: - Part of lot numbered Thirty Eight (38) of the first Subdivision of Cahokia Commons, as per plat in Book of Deeds "M" on page 11, commencing the survey thereof at a point in the Southwesterly line of Casey-ville Road, distant Two Hundred Thirty Five (255) feet Southeast-wardly from the most Northerly corner of said lot, running thence Southeastwardly along said line of Caseyville Road Three Hundred (300) feet, thence Southwestwardly at right angles to said Casey-ville Road, One Hundred Twenty Five (125) feet, thence Northwest-wardly parallel to said Caseyville Road Three Hundred (300) feet, thence Northeastwardly at right angles to said Caseyville Road, to the point of beginning.

Situated in the City of East St. Louis, County of St. Clair, in the State of Illinois.

A tract of land containing Five and Thirty-seven One Hundredths (5.37) acres, by actual survey, located elong the South Line of Gross Avenue between the right of way line of the Venice and Carondelet Railroad, on the West, and the right of way line of the Illinois Terminal Railroad, on the East, extending to the North Line of the property previously conveyed to the Midwale Mining and Vanufacturing Company, said tract of land herein conveyed being known and designated as Block Fifteen (15), of Lansdowne, as per plat thereof recorded in the Recorder's Office of St. Clair County, Illinois, in Plat Book "K", on Page Five (5), subject to the following reservation: A strip of land Thirty (30) feet wide, extending Northwardly from the South Line of said Block Fifteen (15), to Gross Avenue, along the Eastern Line of the Venice and Carondelet Railroad, and a strip of land Thirty (30) feet wide extending Northwardly from the South Line of said Block Fifteen (15), to Gross Avenue,

along the Western Line the Illinois Terminal Railroad are reserved for use as roads, and are to be kept open and unobstructed for the use and benefit of the parties hereto, their grantees and assigns.

Situated in the City of East St. Louis, County of St. Clair, in the State of Illinois.

A strip of land described as follows: Commencing the Survey thereof at a point on the Southeasterly line of the right of way of the Venice and Carondelet Railroad Company, distant Five hundred and eighteen (518) feet and Six (6) inches Northeastwardly from the point of intersection of the line of said right of way with the Northeasterly line of Caseyville Avenue and running thence Southeastwardly parallel with the Northeasterly line of Caseyville Avenue Six hundred and fifty five (655) feet, more or less, to the Northewesterly line of the right of way of the Illinois Transfer Railroad Company, thence Northeastwardly along the Northwesterly line of said Illinois Transfer Railroad Company, Two hundred (200) feet, thence Northwestwardly parallel with said Northeasterly line of Caseyville Avenue, Six hundred and fifty five (655) feet, more or less, to the Southeasterly line of the right of way of the Venice and Carondelet Railroad Company, thence Southwestwardly along said line of the right of way of the Venice and Carondelet Railroad Company, Two hundred (200) feet to the point of beginning.

Located in the subdivision of Lansdowne, County of St. Clair, State of Illinois.

Parts of lots "B" and "C" of Lansdowne subdivision according to the plat thereof recorded in the Recorder's Office of St. Clair County, Illinois in plat book "I", on page 1, and more particularly described as follows, to-wit: Commencing at a point in the westerly line of said lot "C", said point being situated distant 1137.9 feet northwardly from the southwest corner of said lot "C", running thence northwardly along said westerly line of said lot "C" and the extension thereof northwardly a distance of 691.1 feet to the westerly right-of-way line of the Illinois Transfer Railroad; thence southeastwardly along the said westerly right-of-way of said Illinois Transfer Railroad 963 feet, and thence westwardly parallel with the scutherly line of said Lot "C", 617.5 feet to the point of beginning, containing 6.013 acres. Also all interest in and to a certain roadway known as Gross Avenue, sixty feet wide extending slong the Southerly line of said property which as shown by earlier instruments of record is to be kept open for the use and benefit of Joseph T. Donovan, Trustee, and John C. Finck, Jr., their grantees and assigns.

Situated in the Subdivision of Lansdowne, County of St. Clair, in the State of Illinois.

Lots numbered Six (6), Seven (7), Eight (8), Nine (9), Ten (10), Eleven (11), Twelve (12), Thirteen (13), Fourteen (14), Fifteen (15) and Sixteen (16) in Block numbered Seven (7) of National Place; reference being had to the plat thereof recorded in the Recorder's Office of St. Clair County, Illinois, in Book of Plats "I" on page 29.

Situated in the City of East St. Louis, County of St.

Clair, in the State of Illinois.

GEO. S. MEPHAN CORPORATION
By C. M. Cayers

PRINTERING AND PART

Deted this 10th day of Year h - , 1948.

ATT**EST:** 

STATE OF ILLINOIS )

STATE OF ILLINOIS ) SS.
CITY OF EAST ST. LOUIS )

I, the undersigned, a Notary Public, in and for said
City, in the State aforessid, DO HEREBY CERTIFY that Lorens K.
Ayers, personally known to me to be the President of Geo. S.
Nebbar Corporation, and
to me to be the Secretary of said Company, whose names are subscribed
to the foregoing instrument, appeared before me this day, in person,
and severally acknowledged that as such President and Secretary
they signed and delivered the said instrument of writing as President and Secretary of said Company, and caused the Corporate name
and seal of said Company to be affixed thereto, pursuant to authority given them by the Board of Directors of said Company, as
their free and voluntary act; and as the free and voluntary act
of said Company, for the uses and purposes therein set forth.

day of New 1948.

My commission expires

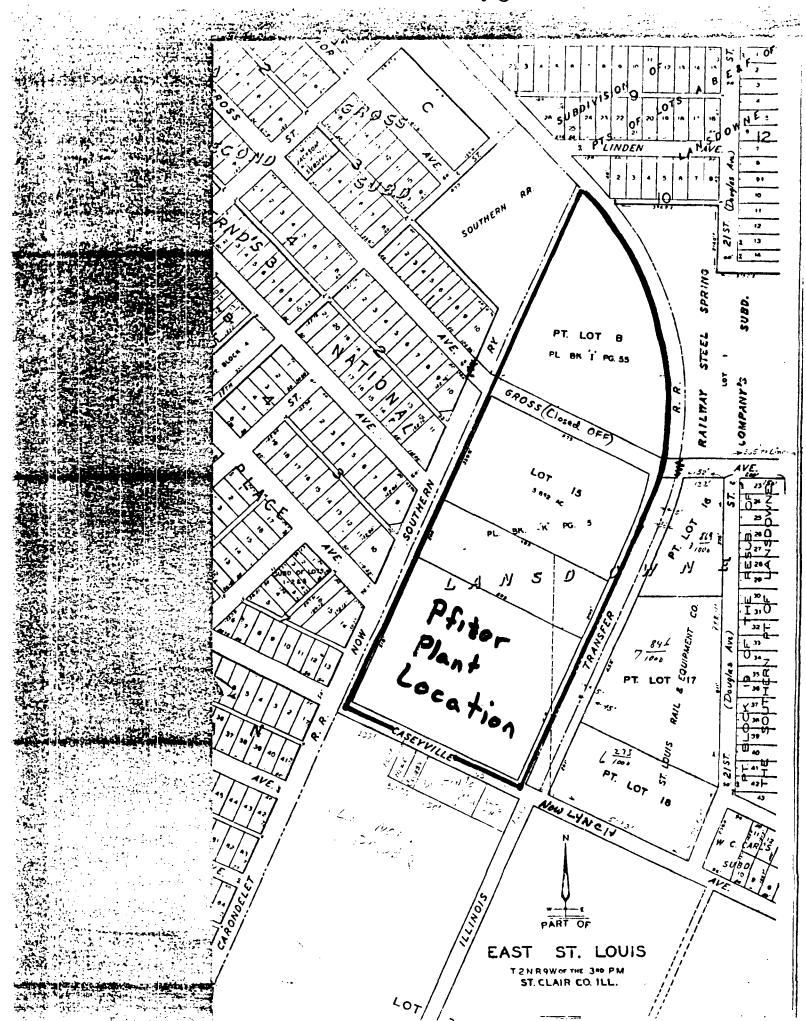
June Schnick

Transfer pursuant to Statutory Consolidation. HO Federal Documentary Stamps required. (Cumulative Bulletin 1944 p. 650)

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A CANADA

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December 27, 1960

Mr. Joseph R. Lowery
Pope and Driemeyer
First National Bank Building
East St. Louis, Illinois

Re: East St. Louis Zoning Ordinance

Dear Joe:

I have your letter of December 19, in which you tell me that the property which C. K. Williams & Co. occupies at present, plus several other parcels of land nearby, have all been scheduled to be zoned as M-2, "Heavy Manufacturing." This is exactly the answer for which we were seeking and we are certainly pleased at the end result.

My compliments to you and your firm for accomplishing this for us. You did an excellent job in bringing the matter to our attention to begin with, and then by pursuing it to a successful conclusion.

Sincerely yours

J. W. Schlosser Vice President

JWS:DE